

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Judge Frederick J. Kapala
)	Magistrate P. Michael Mahoney
AMY JOHNSON)	Case No. 12CR50051

AMENDED MOTION TO MODIFY BOND
(UNOPPOSED)

Comes now Amy Johnson by the Federal Defender Program Carol A. Brook ,Executive Director and Paul E. Gaziano one of her assistants and moves this Honorable Court to enter an order modifying the conditions of pretrial release and in support states:

1. That on August 28, 2012, Ms. Johnson was released on bond which *inter alia* requires her to be subject to travel restrictions and further requiring her to surrender her passport to the pretrial services.
2. That before the return of the Indictment in this cause, Ms. Johnson had made plans and paid for a trip which involve her leaving this district on November 8, 2012 and returning on November 17, 2012. That trip is a cruise of certain islands in the Caribbean Sea.
3. That defense counsel has spoken with Assistant United States Attorney Scott Verseman who has no objection to Ms. Johnson's request to be allowed to travel between the dates set forth above
4. That Ms. Johnson seeks a modification of the conditions of release so that she obtain from her pretrial supervisor her passport and allowing Ms. Johnson to fulfill her prepaid travel plans.
5. Ms. Johnson will supply her pretrial officer with the proposed itinerary and will upon return to this District surrender her passport to the pretrial office.
6. That since the filing of the original motion to modify conditions of release,

defense counsel has been in communication with pretrial services and has been told that pretrial services has no objection to the granting of this motion.

Wherefore, Ms. Johnson prays that this Honorable Court enter an order modifying the conditions of release to allow her to travel outside of this district and to obtain for the purpose of the trip her passport which will be returned to the pretrial office at the conclusion of the trip.

Dated this 23 day of October 2012 in Rockford, Illinois.

Respectfully submitted:
FEDERAL DEFENDER PROGRAM
Carol A. Brook
Executive Director

By: ____/s/_____
Paul E. Gaziano
Attorneys for Defendant

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